

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PRESTON WOOD & ASSOCIATES, LLC,	§	
	§	
Plaintiff,	§	
	§	
VS.	§	CIVIL ACTION NO. 4:16-cv-01427
	§	
RZ ENTERPRISES USA, INC. D/B/A	§	
OPPIDAN HOMES, OPPIDAN HOMES	§	
VII LTD., CAMERON ARCHITECTS, INC.,	§	
and UL, INC. D/B/A URBAN LIVING,	§	
	§	
Defendants.	§	(JURY TRIAL)

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**DEFENDANTS' OBJECTIONS TO PLAINTIFF'S EXHIBITS**

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TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants UL, INC. D/B/A URBAN LIVING, VINOD RAMANI, CAMERON ARCHITECTS, INC., AND STEPHEN CAMERON ("Defendants") and file their Objections to Plaintiff's Exhibits. Defendants object to the introduction of exhibits based on irrelevance, undue prejudice, lack of foundation, and improper authentication.

**I.**  
**DEFENDANTS OBJECT TO THE ADMISSIBILITY OF THE FOLLOWING EXHIBITS**

1. Defendants object to Exhibit 80, PWA Plans: 1. Shared Communities, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Exhibit 80 contains numerous plans not at issue in this case.

2. Defendants object to Exhibit 81, PWA Plans: 2. Box, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice.

Exhibit 81 contains numerous plans not at issue in this case.

3. Defendants object to Exhibit 82, PWA Plans: 3. Tandem, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Exhibit 82 contains numerous plans not at issue in this case.

4. Defendants object to Exhibit 83, PWA Plans: 4. Upside Down, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Exhibit 83 contains numerous plans not at issue in this case.

5. Defendants object to Exhibit 84, PWA Plans: 5. Communities, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Exhibit 84 contains numerous plans not at issue in this case.

6. Defendants object to Exhibit 85, PWA Plans: 6. For 25' x 100' Lots with Living Downstairs, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Exhibit 85 contains numerous plans not at issue in this case.

7. Defendants object to Exhibit 86, PWA plans: Collage, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Exhibit 86 contains numerous plans not at issue in this case.

8. Defendants object to Exhibit 102, Cameron/UPM-Bindal contract, because this document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice.

9. Defendants object to Exhibit 112, Oppidan Nagle P&L, this document has not been properly authenticated, and lacks foundation.

10. Defendants object to Exhibit 113, UL pageview summary document, because

this document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice. Pageviews are irrelevant to the determination of damages as detailed in Defendants' Memorandum of Law on Statutory Damages Under the DMCA and may not be considered when determining statutory damages.

11. Defendants object to Exhibit 114, PWA's original plan, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice.

12. Defendants object to Exhibit 115, Cameron's revision of PWA's drawings for Mount Vernon, because the document is irrelevant. Any probative value is substantially outweighed by a danger of unfair prejudice.

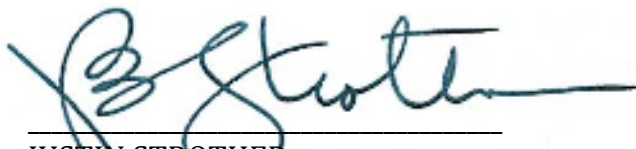
13. Defendants object to Exhibit 137, CV of Expert Suzanne Labarthe, Architect, this document is hearsay, has not been properly authenticated, and lacks foundation.

**II.**  
**PRAYER**

14. WHEREFORE, PREMISES CONSIDERED, Defendants pray that this Court sustain their objections to Plaintiff's exhibits, and grant Defendants such other and further relief, in law or equity, to which they may show themselves justly entitled.

Respectfully submitted,

**STROTHER LAW FIRM**

A handwritten signature in blue ink, appearing to read "J. Strother", is written over a horizontal line.

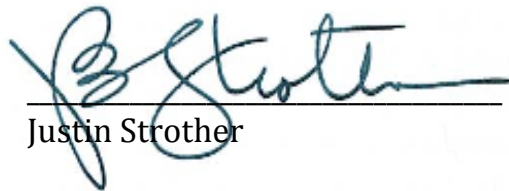
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ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of August 2018, a true and correct copy of the foregoing has been forwarded to all counsel of record via courier service or via electronic service through the court clerk.



Justin Strother